

PROSKAUER ROSE LLP

One Newark Center

Newark, NJ 07102-5211

Tel. (973) 274-3200

Fax (973) 274-3299

Anthony L. Hall, Esq.
ahall@hollandhart.com
Nevada Bar No. 5977
Joseph G. Went, Esq.
jgwent@hollandhart.com
Nevada Bar No. 9220
HOLLAND & HART LLP
9555 Hillwood Drive, Second Floor
Las Vegas, Nevada 89134
Tel. (702) 669-4600
Fax (702) 669-4650

And

Joseph C. O'Keefe, Esq. (*pro hac vice*)
jokeefe@proskauer.com
Nicole Eichberger, Esq. (*pro hac vice*)
neichberger@proskauer.com
PROSKAUER ROSE LLP
One Newark Center
Newark, NJ 07102-5211
Tel. (973) 274-3200
Fax (973) 274-3299

Attorneys for Plaintiffs/Counterdefendants

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEW ENGLAND LIFE INSURANCE
COMPANY, METROPOLITAN LIFE
INSURANCE COMPANY,

Plaintiffs,

vs.

JIMMY LEE, an individual, JOHN (a/k/a JACK)
EWING, an individual, KARIN METCALF, an
individual, WEALTH CONSULTING GROUP,
LLC, THE WEALTH CONSULTING GROUP
LLC, and KAIZEN CONSULTANTS, LLC,

Defendants.

Case No. 14 CV 01797(JCM)(NJK)

**STIPULATION AND
PROPOSED ORDER TO DISMISS
WITH PREJUDICE**

PROSKAUER ROSE LLP

One Newark Center

Newark, NJ 07102-5211

Tel. (973) 274-3200

Fax (973) 274-3299

JIMMY LEE, an individual, WEALTH
CONSULTING GROUP, LLC; THE WEALTH
CONSULTING GROUP LLC; KAIZEN
CONSULTANTS LLC,

Counterclaimants,

vs.

NEW ENGLAND LIFE INSURANCE
COMPANY, METROPOLITAN LIFE
INSURANCE COMPANY,

Counterdefendants.

Pursuant to Federal Rule of Civil Procedure 41(a)(1) and Local Rule 7-1, Plaintiffs/Counterdefendants New England Life Insurance Company (“NELICO”), and Metropolitan Life Insurance Company (“MetLife”); Defendants/Counterclaimants Jimmy Lee (“Lee”), Wealth Consulting Group, LLC (“WCG”), The Wealth Consulting Group LLC (“TWCG”), and Kaizen Consultants LLC (“Kaizen”) (collectively, the “Lee Parties”); Defendant/Counterclaimant John (a/k/a Jack) Ewing (“Ewing”); and Defendant/Counterclaimant Karin Metcalf (“Metcalf”), through their respective counsel, hereby stipulate and agree that this matter shall be dismissed in its entirety, with prejudice. Each side to bear its own costs and attorneys’ fees.

DATED this 7th day of September, 2016.

Proskauer Rose LLP

By: s/ Joseph C. O’Keefe
Joseph C. O’Keefe, Esq. (*pro hac vice*)
Nicole A. Eichberger, Esq. (*pro hac vice*)
Proskauer Rose LLP
One Newark Center, 18th Floor
Newark, New Jersey 07102
(973) 274-3200

- and -

Anthony L. Hall, Esq.
Nevada Bar No. 5977
Joseph G. Went, Esq.
Nevada Bar No. 9220
Holland & Hart LLP

1 Nevada Bar No. 11066
2 9555 Hillwood Drive, 2nd Floor
3 Las Vegas, Nevada 89134

4 *Attorneys for Plaintiffs/Counterdefendants*
5 *New England Life Insurance Company and*
6 *Metropolitan Life Insurance Company*

7
8 DATED this 7th day of September, 2016.

9 BAILEY ❖ KENNEDY

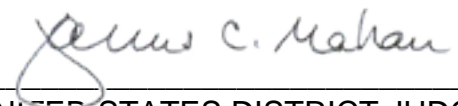
10 By: s/ Joshua M. Dickey
11 JOHN R. BAILEY
12 JOSHUA M. DICKEY
13 PAUL C. WILLIAMS
14 AMANDA L. STEVENS
15 8984 Spanish Ridge Avenue
16 Las Vegas, Nevada 89148
17 *Attorneys for Defendants/Counterclaimants*
18 *Jimmy Lee; Wealth Consulting Group, LLC;*
19 *The Wealth Consulting Group LLC; and*
20 *Kaizen Consultants LLC*

DATED this 7th day of September, 2016.

JAMES KWON, LLC

By: s/ James W. Kwon
JAMES W. KWON
5808 Spring Mountain Road
Suite 107
Las Vegas, Nevada 89146
Attorneys for Defendants/Counterclaimants
John aka Jack Ewing and Karin Metcalf

21 IT IS SO ORDERED September 8, 2016.

22 
23
24
25
26
27
28 UNITED STATES DISTRICT JUDGE

PROSKAUER ROSE LLP

One Newark Center
Newark, NJ 07102-5211
Tel. (973) 274-3200
Fax (973) 274-3299

PROSKAUER ROSE LLP

One Newark Center

Newark, NJ 07102-5211

Tel. (973) 274-3200

Fax (973) 274-3299

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(d), I hereby certify that on the 7th day of September, 2016, I served a true and correct copy of the foregoing **STIPULATION OF DISMISSAL WITH PREJUDICE OF CLAIMS AS AGAINST LEE DEFENDANTS, EWING, AND METCALF AND ALL COUNTERCLAIMS AS AGAINST PLAINTIFFS/COUNTERDEFENDANTS** by ECF on all counsel of record.

DATED this 7th day of September, 2016.

PROSKAUER ROSE, LLP

/s/ Joseph C. O'Keefe

Anthony L. Hall, Esq.

Nevada Bar No. 5977

ahall@hollandhart.com

Joseph G. Went, Esq.

Nevada Bar No. 9220

jgwent@hollandhart.com

HOLLAND & HART LLP

9555 Hillwood Drive, 2nd Floor

Las Vegas, Nevada 89134

-and-

Joseph C. O'Keefe, Esq. (*pro hac vice*)

jokeefe@proskauer.com

Nicole A. Eichberger, Esq. (*pro hac vice*)

neichberger@proskauer.com

PROSKAUER ROSE LLP

One Newark Center

Newark, NJ 07102-5211

*Attorneys for Plaintiffs/Counterdefendants
New England Life Insurance Company and
Metropolitan Life Insurance Company*